

**EXHIBIT 11**

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**From:** donald@creadorelawfirm.com  
**Sent:** Tuesday, January 19, 2021 5:39 PM  
**To:** Robert Drain  
**Cc:** Knudson, Jacquelyn Swanner; NYSBml\_Drain's\_Chambers; McClammy, James I.; Huebner, Marshall S.; Oluwole, Chautney M.; Townes, Esther C.; sbickford@mbfirm.com; srd@mbfirm.com; usdcndoh@mbfirm.com; khr@khrlawoffices.com; Rocco A. Cavaliere; smarkowitz\_tarterkrinsky.com; Michael Z. Brownstein; srb@mbfirm.com; Scott Markowitz; don creadore  
**Subject:** RE: [EXT] RE: In re Purdue Pharma L.P., Case No. 19-23649 (RDD) - Debtors' Objection to the NAS Children Ad Hoc Committee's Motion to Seal

To The Honorable Robert D. Drain,

The Debtors and counsel for the NAS Children Ad Hoc Committee (the "NAS Committee") wanted to provide the Court with an update on the status of the NAS Committee's Rule 2004 Motion and the agreed path forward discussed on December 22, 2020.

The NAS Committee has coordinated with the Official Committee of Unsecured Creditors (the "UCC") to run targeted search terms on the UCC and Sackler Families databases in accordance with a mutually-agreed protocol between the producing parties, the UCC, and the NAS Committee. These search terms returned over 505,111 documents in total, of which 264,000 documents are produced by the Debtors. Last week, the Debtors confirmed in writing with the UCC that the Debtors' documents may be made available to the NAS Committee. The NAS Committee expects to receive the Debtors' documents from the UCC this week and, thereafter, can begin the process of reviewing those documents.

The Debtors and the NAS Committee are scheduled to participate in a meet and confer on this subject and others on January 19, 2021, and expect to schedule a further meet and confer once the NAS Committee has had an opportunity to properly review the documents produced by Debtors.

*Respectfully submitted,*  
Purdue NAS Children Ad Hoc Committee  
/s/ Scott R. Bickford, Esq.

/s/ Donald E. Creadore, Esq.

/s/ Kent Harrison Robbins, Esq.

Donald E. Creadore  
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donald@creadorelawfirm.com

-----Original Message-----

From: "Robert Drain" <judge\_drain@nysb.uscourts.gov>

Sent: Tuesday, December 22, 2020 11:53am

To: "Knudson, Jacquelyn Swanner" <jacquelyn.swanner@davispolk.com>

Cc: "NYSBml\_Drain's\_Chambers" <rdd.chambers@nysb.uscourts.gov>, "McClammy, James I." <james.mcclammy@davispolk.com>, "Huebner, Marshall S." <marshall.huebner@davispolk.com>, "Oluwole, Chautney M." <chautney.oluwole@davispolk.com>, "Townes, Esther C." <esther.townes@davispolk.com>, "sbickford@mbfirm.com" <sbickford@mbfirm.com>, "srd@mbfirm.com" <srd@mbfirm.com>, "usdcndoh@mbfirm.com" <usdcndoh@mbfirm.com>, "donald@creadorelawfirm.com" <donald@creadorelawfirm.com>, "khr@khrlawoffices.com" <khr@khrlawoffices.com>, "Rocco A. Cavaliere" <rcavaliere@tarterkrinsky.com>, "smarkowitz\_tarterkrinsky.com" <smarkowitz@tarterkrinsky.com>, "Michael Z. Brownstein" <mbrownstein@tarterkrinsky.com>, "srb@mbfirm.com" <srb@mbfirm.com>  
Subject: RE: [EXT] RE: In re Purdue Pharma L.P., Case No. 19-23649 (RDD) - Debtors' Objection to the NAS Children Ad Hoc Committee's Motion to Seal

Very well – thank you.

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**From:** Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>

**Sent:** Tuesday, December 22, 2020 11:47 AM

**To:** Robert Drain <judge\_drain@nysb.uscourts.gov>

**Cc:** NYSBml\_Drain's\_Chambers <rdd.chambers@nysb.uscourts.gov>; McClammy, James I. <james.mcclammy@davispolk.com>; Huebner, Marshall S. <marshall.huebner@davispolk.com>; Oluwole, Chautney M. <chautney.oluwole@davispolk.com>; Townes, Esther C. <esther.townes@davispolk.com>; sbickford@mbfirm.com; srd@mbfirm.com; usdcndoh@mbfirm.com; donald@creadorelawfirm.com; khr@khrlawoffices.com; Rocco A. Cavaliere <rcavaliere@tarterkrinsky.com>; smarkowitz\_tarterkrinsky.com <smarkowitz@tarterkrinsky.com>; Michael Z. Brownstein <mbrownstein@tarterkrinsky.com>; srb@mbfirm.com

**Subject:** RE: [EXT] RE: In re Purdue Pharma L.P., Case No. 19-23649 (RDD) - Debtors' Objection to the NAS Children Ad Hoc Committee's Motion to Seal

**CAUTION - EXTERNAL:**

To The Honorable Robert D. Drain,

The Debtors and counsel for the NAS Children Ad Hoc Committee (the “NAS Committee”) had a productive meet and confer yesterday. We have agreed to the following path forward with respect to the underlying Rule 2004 Motion: the NAS Committee will coordinate with the Official Committee of Unsecured Creditors (the “UCC”) to run targeted search terms on the UCC and Sackler Families databases over the next few days. The Debtors will confirm with the UCC that any documents that hit on the NAS Committee’s targeted searches can be made available to NAS Committee counsel. Through this process, the NAS Committee may find that it is unlikely that there are any additional animal studies in the Debtors’ possession. If, however, the NAS Committee finds information suggesting additional searches might be needed, the Debtors agree to discuss additional searches with the NAS Committee and cooperate with any additional searches that the Debtors and NAS Committee agree are warranted.

Regarding your question concerning the NAS Committee’s pending Motion to Seal—whether there is any objection to the Motion to Seal before the Rule 2004 Motion is filed and a hearing is scheduled on it—the Debtors do not have an objection to the Motion to Seal. The Debtors objection is to the underlying Rule 2004 Motion. Given the outcome of the meet and confer with respect to the Rule 2004 Motion, the parties propose that any hearing on the Rule 2004 Motion await our further meet and confer after the search terms have been run on the UCC and Sackler Families productions, as that may narrow the issues presented to the Court.

Respectfully submitted,

Jacquelyn Knudson

**Jacquelyn Swanner Knudson**

**Davis Polk & Wardwell LLP**

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**From:** Scott Markowitz <[SMarkowitz@tarterkrinsky.com](mailto:SMarkowitz@tarterkrinsky.com)>

**Sent:** Monday, December 21, 2020 2:36 PM

**To:** Robert Drain <[judge\\_drain@nysb.uscourts.gov](mailto:judge_drain@nysb.uscourts.gov)>

**Cc:** Knudson, Jacquelyn Swanner <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>; NYSBml\_Drain's\_Chambers <[rdd.chambers@nysb.uscourts.gov](mailto:rdd.chambers@nysb.uscourts.gov)>; McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>; Huebner, Marshall S. <[marshall.huebner@davispolk.com](mailto:marshall.huebner@davispolk.com)>; Townes, Esther C. <[esther.townes@davispolk.com](mailto:esther.townes@davispolk.com)>; [sbickford@mbfirm.com](mailto:sbickford@mbfirm.com); [srd@mbfirm.com](mailto:srd@mbfirm.com); [usdcendoh@mbfirm.com](mailto:usdcendoh@mbfirm.com); [donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com); [khr@khrlawoffices.com](mailto:khr@khrlawoffices.com); Rocco A. Cavaliere <[rcavaliere@tarterkrinsky.com](mailto:rcavaliere@tarterkrinsky.com)>

**Subject:** Re: [EXT] RE: In re Purdue Pharma L.P., Case No. 19-23649 (RDD) - Debtors' Objection to the NAS Children Ad Hoc Committee's Motion to Seal

Thank you judge Drain . We have a call set for today at 4 pm with Debtors' counsel . We will advise you after that call .



**Scott Markowitz | Partner**

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On Dec 21, 2020, at 2:32 PM, Robert Drain <[judge\\_drain@nysb.uscourts.gov](mailto:judge_drain@nysb.uscourts.gov)> wrote:

There are two motions by the NAS Babies Ad Hoc Committee before me: a motion under Bankruptcy Rule 2004 for the production of certain documents and a motion to file the foregoing motion under seal and for permission to file a redacted version of the Rule 2004 motion on the docket. The Debtor's response to the latter, sealing motion is really a response to the former, Rule 2004 motion. If there is an objection to a Rule 2004 motion, I would normally have it scheduled for a hearing. But please confirm whether there is any objection to the motion to seal before the Rule 2004 motion is filed and a hearing is scheduled on it. Alternatively, if the parties want to discuss this in a chambers conference, I'm happy to do that, too. In preparation for such a conference, or for a hearing, you should know that it seems to me that one of the debtors' objections should be focused on, i.e. that the debtors don't have the documents in question in

their possession, custody or control. If that were clearly the case, then the 2004 motion isn't going anywhere. However, the debtors also argue that it would be unduly burdensome to search for the documents in question, notwithstanding that the parties seem to have identified those documents perhaps narrowly enough for a focused search; so why can't such a focused search be undertaken?

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**From:** Knudson, Jacquelyn Swanner <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>

**Sent:** Friday, December 18, 2020 4:38 PM

**To:** NYSBml\_Drain's\_Chambers <[rdd.chambers@nysb.uscourts.gov](mailto:rdd.chambers@nysb.uscourts.gov)>

**Cc:** McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>; Huebner, Marshall S. <[marshall.huebner@davispolk.com](mailto:marshall.huebner@davispolk.com)>; Townes, Esther C. <[esther.townes@davispolk.com](mailto:esther.townes@davispolk.com)>; smarkowitz\_tarterkrinsky.com <[smarkowitz@tarterkrinsky.com](mailto:smarkowitz@tarterkrinsky.com)>; sbickford@mbfirm.com; [srd@mbfirm.com](mailto:srd@mbfirm.com); [usdcndoh@mbfirm.com](mailto:usdcndoh@mbfirm.com); [donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com); [khr@khrlawoffices.com](mailto:khr@khrlawoffices.com); Rocco A. Cavaliere <[rcavaliere@tarterkrinsky.com](mailto:rcavaliere@tarterkrinsky.com)>

**Subject:** In re Purdue Pharma L.P., Case No. 19-23649 (RDD) - Debtors' Objection to the NAS Children Ad Hoc Committee's Motion to Seal

**CAUTION - EXTERNAL:**

To The Honorable Robert D. Drain,

We are counsel to Purdue Pharma L.P. and the other debtors and debtors in possession (collectively, the "Debtors") in the chapter 11 proceedings jointly administered under Case No. 19-23649.

Pursuant to your request, please find attached a copy of the Debtors' Objection to the NAS Children Ad Hoc Committee's Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 105(a) and 107(b) and Fed. R. Bankr. P. 9018 Authorizing the Filing of Certain Information and Exhibits Under Seal in Connection with the NAS Children Ad Hoc Committee's Ex Parte Motion Requesting a Court Order Authorizing Examinations Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9006 [ECF No. 2155] (the "**Objection**").

If Chambers has any questions regarding the Objection or requires any additional information, please contact Jim McClammy at: [james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com), or 347-260-3092.

Respectfully submitted,  
Jacquelyn Knudson

**Jacquelyn Swanner Knudson**

**Davis Polk & Wardwell LLP**

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Tarter Krinsky & Drogin LLP, Attorneys-at-Law.

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